



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

July 2, 2020

**BY ECF**

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. David Leanos Perez*, 20 Cr. 300 (PAC)**

Dear Judge Crotty:

With the consent of defense counsel, the Government seeks an adjournment of the deadline of July 7, 2020 to respond to the defendant's letter seeking certain records relating to the selection of the grand jury that returned the indictment in this case. As the Court is aware, similar requests are pending in numerous cases in this District. On June 30, 2020 in the case of *United States v. Balde*, 20 Cr. 281 (KPF), Judge Failla presided over a conference call with the Jury Administrator for the Southern District of New York, Linda Thomas. Counsel for the Government and the defendant in this case were invited to and did participate in the call. During that call, Ms. Thomas provided additional information about the existence and form of documents responsive to the defendant's requests. Judge Failla has ordered the parties in *Balde* to meet and confer about whether there is any dispute as to which documents requested by the defense should be produced, and to submit a joint status letter no later than July 14. Because the document requests in this case are substantially similar to those in *Balde*, the Government believes that any agreement reached in that case is likely to moot much if not all of any dispute in this case. Accordingly, the Government requests that the Court extend the current deadline to July 21, at which time the parties can notify the Court whether there is any dispute regarding the defendant's document requests.

7-6-2020  
The government's time to  
respond is extended to  
July 21, 2020. SO  
ORDERED.

A handwritten signature in black ink, appearing to read "Paul A. Crotty", is located below the court's order.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By: /s/ Daniel G. Nessim  
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